

order for purposes of Civil Local Rule 5.3(b)” and requires all materials containing “Confidential Information or Highly Confidential Information” (as defined in the Protective Order) to be filed under seal according to the procedures contained in the Protective Order. *See* Protective Order ¶7. The Protective Order also applies “to non-parties.” *See* Protective Order ¶19. HMMA has determined in good faith that its filing contains confidential and proprietary information that meets the Protective Order’s definitions of “Confidential” or “Highly Confidential—Outside Attorneys Only” information. No means other than sealing will preserve the confidentiality of HMMA’s confidential business information.

Dated: May 23, 2016

Respectfully submitted,

/s/ Meredith Jones Kingsley

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CERTIFICATE OF SERVICE

I certify that on May 4, 2016, I caused a true and correct copy of the foregoing NON-PARTY HYUNDAI MOTOR MANUFACTURING ALABAMA, LLC'S NOTICE OF FILING UNDER SEAL ITS REPLY BRIEF IN SUPPORT OF OBJECTIONS TO, AND MOTION TO MODIFY, THE SPECIAL MASTER'S ORDER REGARDING NON-PARTY RULE 30(b)(6) DEPOSITIONS AND FAILURE TO RECOGNIZE HYUNDAI MOTOR MANUFACTURING ALABAMA AS A SMALLER SSE to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Meredith Jones Kingsley
Meredith Jones Kingsley

*Attorney for Hyundai Motor Manufacturing
Alabama, LLC ("HMMA")*